State of Illinois Illinois Commerce Commission

AMEREN TRANSMISSION COMPANY OF ILLINOIS)
)
Petition for Certificate of Public Convenience and)
Necessity, pursuant to Section 8-406.1 of the Illinois Public)
Utilities Act, and an Order pursuant to Section 8.503 of the)
Public Utilities Act, to Construct, Operate and Maintain a)
New High Voltage Electric Service Line and Related) Docket No. 12-0598
Facilities in the Counties of Adams, Brown, Cass,)
Champaign, Christian, Clark, Coles, Edgar, Fulton, Macon,)
Montgomery, Morgan, Moultrie, Pike, Sangamon,)
Schuyler, Scott and Shelby, Illinois.)

MOTION FOR ADMISSION OF THE DIRECT TESTIMONY OF RICHARD M. EHRHART INTO THE RECORD

Comes now N. KOHL GROCER COMPANY, by and through its attorneys and pursuant to Rule 200.210 of the Commission's Rules of Practice, 83 Ill. Admin. Code 200.210, moves for the Administrative Law Judges to admit the Direct Testimony of Richard M. Ehrhart, filed in the e-Docket system on March 29, 2013 and supported by Affidavit filed electronically on May 14, 2013 (the "Direct Testimony"), into the record, and in support thereof states as follows:

- 1. On April 22, 2013, N. Kohl Grocer Company and Ameren Transmission Company of Illinois filed a Motion to File and Admit a Stipulation Between Ameren Transmission Company of Illinois and N. Kohl Grocer Company (the "Stipulation Motion");
- 2. In accordance with the Stipulation, N. Kohl Grocer Company fully supports the Commission's adoption of the route designated in the Stipulation, and thus was not present during the evidentiary hearing and did not submit an oral motion to admit the Direct Testimony of Richard M. Ehrhart into the record at that time.
- 3. However, as set forth in the Stipulation Motion, the Stipulation "is expressly conditioned on the Commission's issuance of an Order approving the Stipulated Route River to

Quincy in its entirety and without material alteration." Thus, in the event that the Commission denies the Stipulation Motion, N. Kohl Grocer would ask that Commission to take into consideration its Direct Testimony.

WHEREFORE, for the above reasons, N. Kohl Grocer moves for the admission of the Direct Testimony of Richard M. Ehrhart into the evidentiary record in this case.

Respectfully Submitted,

N. KOHL GROCER COMPANY

Luke A. Hagedorn One of Its Attorneys

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¹ Stipulation Exhibit 4, ¶12.

VERIFICATION

I, Luke A. Hagedorn, certify that: i.) I am an attorney for N. Kohl Grocer Company; ii) I have read the foregoing *Motion*; iii) I am familiar with the facts stated therein; and iv) the facts are true to the best of my knowledge, information and belief.

Luke A. Hagedorn

STATE OF KANSAS)	
)	SS
COUNTY OF JOHNSON)	

SUBSCRIBED AND SWORN to before me this 24th day of May, 2013

Notary Public

My Commission expires

ANN-MARIE OTTLEY
Notary Public - State of Kansas

My Appl. Expires <u>6-26-13</u>